

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

## **GOVERNMENT'S SENTENCING MEMORANDUM**

AND NOW comes the United States of America, by its attorneys, Stephen R. Kaufman, Acting United States Attorney for the Western District of Pennsylvania, and Shaun E. Sweeney, Assistant United States Attorney for said district, submitting as follows:

As set forth in the Government's Position With Respect to Sentencing Factors, the government has no objections or requests for modification of the Presentence Investigation Report (PIR). As to the specific sentence to be imposed, government counsel notes that the PIR states that the applicable range is 30-37 months. The government submits that a sentence within the applicable range would be appropriate, as it would be sufficient, but not greater than necessary, to achieve the sentencing purposes set forth in 18 U.S.C. 3553(a)(2).

At the sentencing hearing, the government intends to call one law enforcement witness, who will testify regarding the events and participants which are depicted in videos of the civil disorder and the burning of the first police vehicle on May 30, 2020. The government's video exhibit is a combination of three videos, with a total viewing time of approximately five minutes. Copies of the video exhibit are being sent out to defense counsel via United States mail, and a copy

will be delivered to the Court's chambers this week as well.

Respectfully submitted,

STEPHEN R. KAUFMAN  
Acting United States Attorney

/s/ Shaun E. Sweeney  
SHAUN E. SWEENEY  
Assistant United States Attorney  
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